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ATHLETICS



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DEPT OF TRANSPORTATION
ROOM 41

Re: Docket # FAA-2000-8274 - 141

To Whom It May Concern:

The Ohio State University would like to comment on the Notice of Proposed Rulemaking (NPRM) governing Temporary Flight Restrictions (TFR) (Docket No. FAA-2000-8274; Notice No. 00-13). The University fully supports and endorses the Federal Aviation Administration's efforts to improve aviation safety in this effort.

On no less than six Saturdays each fall, the University is host to over 100,000 people who, while watching our football games, are compressed within a very small area. For a number of years, approximately 10-12 airplanes towing banners continually circle the stadium for hours before, during, and after games in a relatively tight formation. The University has long contended such activities are a serious threat to the safety and well being of our attendees. In fact, on one occasion, observers witnessed two helicopters nearly crash during a football game. Safety is also a concern if any of the banners (which weigh approximately 400 lbs.) trailing behind the planes fell into the stadium.

In addition, given the concentration of University facilities and the compactness of adjoining residential neighborhoods, there are very few options for pilots to consider should an emergency landing become necessary.

Ohio Stadium lies within a 10 nautical mile radius of three airports, Port Columbus International, The Ohio State University Don Scott Field, and Bolton Field, and within 15 nautical miles of Rickenbacker Airport, resulting in increased air traffic over the stadium. Moreover, the stadium lies under the extended approach to Runways 10R & 10L of Port Columbus International Airport. At a

distance of roughly six miles from the runway threshold, the necessary glide path places approaching/departing aircraft at a minimum altitude of 630 feet. In order for the banner towing airplanes to operate at the minimum safe altitude of 1,000 feet (above the highest obstacle), as defined in the Federal Aviation Regulations, they are well within the flight path of aircraft approaching or departing Port Columbus International Airport. Therefore, existing air traffic above Ohio Stadium is already busy. Continuing to allow banner towing airplanes within that same airspace on game days significantly increases dangers.

The FAA has properly recognized that such events involving large numbers of spectators are unique. Indeed, in the NPRM itself, the rule lists examples of numerous sporting events that might qualify for TFRs. We believe that football games at Ohio State (with a stadium capacity of over 100,000 people) should also qualify for TFR's as we have more citizens at risk than most if not all of the other events listed in the NPRM which do not draw as many attendees. Clearly, the hazards these low-flying airplanes cause must be weighed against any perceived benefit that these plans provide, and we believe that the safety risks outweigh the benefits. As one of the largest football stadiums in the nation, Ohio Stadium needs the protections TFRs can provide.

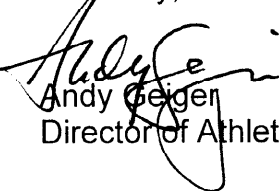
This issue is not isolated to Ohio Stadium, but is indeed a national problem at such large events. We believe that the NPRM correctly perceives that providing special protection for unique large gatherings of people at sporting and other events is in the public interest, and that is why we support it so strongly.

We appreciate the opportunity to comment on this proposal. The FAA, through this initiative, could have a significant impact on providing our 100,000 guests and the neighborhood around our stadium an additional margin of safety and enjoyment not currently afforded. So, we urge you to craft a final version of this rule that will provide us with this protection.

Sincerely,



William J. Shkurti
Senior Vice President
for Business and Finance



Andy Geiger
Director of Athletics